

Tim A. Pori (SBN 189270)
 LAW OFFICES OF TIM A. PORI
 521 Georgia Street
 Vallejo, CA 94590
 Tel: (707) 644-4004
 Fax: (707) 644-7528

Attorney for Plaintiff CHAD ANGLE

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHAD ANGLE,)
)
 Plaintiff,)
)
 vs.)
)
 ALAMEDA COUNTY MEDICAL)
 CENTER; MOHAMMED A. HYDERI,)
 MD, an individual; ALAMEDA COUNTY,)
 an incorporated public entity; CHARLES C.)
 PLUMMER, in his capacity as Sheriff of)
 Alameda County;)
 KEITH VAN DICKEN, ZAHROD)
 GRIFFIN, VINCENT CERVELLI,)
 RICHARD RAY, RYAN PECK,)
 ERIC RHIENOR, and KENNETH)
 BRAAKSMA,)
 as individuals and in their capacities as)
 Alameda County Sheriff's Deputies;)
 and DOES 1 through 100, inclusive,)
)
 Defendants)

Case No. C07-00250 JCS

**STIPULATION, REQUEST AND
 [PROPOSED] ORDER TO
 CONTINUE CASE MANAGEMENT
 CONFERENCE**

Honorable Susan Illston

The parties herein, through their respective counsel, respectfully request that the Case Management Conference in the above-entitled matter be continued to a date mutually convenient to the court and all parties. The parties further request that the Court re-set all pre-Case Management Conference deadlines and obligations, including Rule 26 obligations, so as to be calculated and set based on the new Case Management Conference date.

The Case Management Conference is currently set for April 27, 2007, at 2:00 p.m. The parties are requesting the continuance because Tim A. Pori, counsel for Plaintiff, Chad Angle, has filed a motion for leave to withdraw from representation in this matter due to physical impairments resulting from his current and on-going treatment for metastatic colon cancer. Mr. Pori's motion to withdraw is set for hearing on April 13, 2007. Due to his on-going treatment, Mr. Pori is not able to meet and confer with opposing counsel for preparation of the Joint Case Management Conference Statement. Mr. Angle will not be able to participate in a meet and confer conference in pro per as he is currently incarcerated at San Quentin State Prison.

LAW OFFICES OF TIM A. PORI

Dated: _____ By: /s/ Tim A. Pori
TIM A. PORI
Attorney for Plaintiff CHAD ANGLE

BOORNAZIAN, JENSEN & GARTHE

Dated: _____ By: /s/ Christopher E. Brumfiel (Authorized 3/29/07)
GREGORY J. ROCKWELL
Attorneys for Defendants ALAMEDA COUNTY
MEDICAL CENTER and
MOHAMMED A. HYDERI

PATTON, WOLAN, CARLISE, LLP

Dated: _____ By: /s/ Jesper I. Rasmussen (Authorized 3/29/07)
JESPER I. RASMUSSEN
Attorneys for Defendants COUNTY OF
ALAMEDA, CHARLES C. PLUMMER, KEITH
VAN DICKEN, ZAHROD GRIFFIN, VINCENT
CERVELLI, RICHARD RAY, RYAN PECK,
ERIC PHIENOR and KENNETH BRAAKSMA

I hereby attest that I have on file all holographic signatures for any signatures indicated by a "conformed" signature (/s/) within this e-filed document and/or written agreement to this document from all counsel.

Dated: March 29, 2007 /s/ Tim A. Pori

[PROPOSED] ORDER

It is so ordered.

The Case Management Conference is continued to 6/15/07, 2007
at 2 p.m..

All pre-Case Management Conference deadlines and obligations, including Rule 26 obligations, will be recalculated and set based upon this new Case Management Conference date.



SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE